

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of: **Chen et al.** § Group Art Unit: **2626**
Serial No. **10/617,526** § § Examiner: **Neway, Samuel G.**
Filed: **July 10, 2003** § § Confirmation No.: **3551**
For: **Traditional Chinese / Simplified** § § Attorney Docket No.: **AUS920030523US1**
Chinese Character Translator §

37945

PATENT TRADEMARK OFFICE
CUSTOMER NUMBER

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF (37 C.F.R. 41.41)

This Reply Brief is submitted in response to the Examiner's Answer mailed on October 5, 2009.

No fees are believed to be required to file a Reply Brief. If any fees are required, I authorize the Commissioner to charge these fees which may be required to IBM Corporation Deposit Account No. 09-0457.

RESPONSE TO EXAMINER'S ANSWER

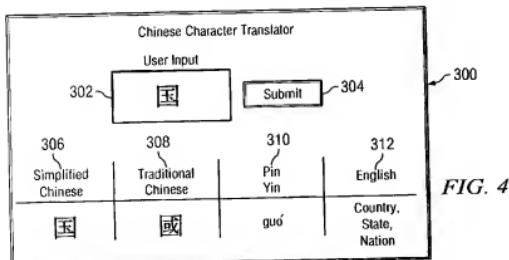
The Examiner made several arguments in section 10, Response to Arguments, of the Examiner's Answer. These arguments are addressed below.

I. Double patenting rejection

In regard to the double patenting rejection based on application 10/631,070, the Examiner states the following:

However, the claims of Application No.1 0/631,070 disclose displaying many translations of a Chinese character including an accented Pin Yin and English. It would have been obvious to one with ordinary skill in the art to have displayed different forms of Pin Yin corresponding to the Chinese character specially using the claimed Unicode which is an international standard encoding scheme for all the major languages in the world.

Appellants submit that the Examiner overlooked the following distinction. The claims in application 10/717,526 are directed toward a single "Simplified Chinese character." The claims of Application 10/631,070 are directed toward a single "Simplified Chinese word." Indeed, application 10/717,526 is consistent in referring only to input of a single character in claims. Likewise, application 10/631,070 is consistent in referring only to input of a word in the claims. The differences between a character and a word can be seen readily in the Figures of the two applications. Figure 4 of the application on appeal is set forth below:



The single character entered in user input field 302 is displayed as item 306 along with item 308, 310, and 312. The English translation 312 can be seen to be different from the words claimed by application 10/631,070. Figure 9 of co-pending application 10/631,070 is set forth below. As can be seen multiple characters form words that have different meanings. Words have different meanings from single characters as set forth in the 10/617,526 application.



FIG. 9

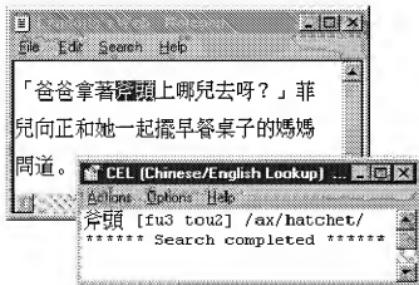
The Examiner further stated that Appellants argue that claim 1 of application no. 10/631,070 recites limitations not present in claim 1 of the current application (Appeal Brief, pages 13 and 14). Specifically, the Examiner states: “[i]n this case the limitations omitted from the claims of the current application, specifically “determining if the user input is an entire desired word, a beginning of the entire word, or whether the user input appears anywhere in the desired word” limits the search of Chinese words for example by limiting the search to words that begin with a Chinese character but does not alter the function of translating Chinese

characters.” Appellants submit that the Examiner erred in failing to consider the difference between a single character in Simplified Chinese and a word in Simplified Chinese since persons skilled in the art are aware that multiple characters form words in Chinese. Therefore, when only a single character is to be considered, there is no need to determine if the input is the beginning of a word. Furthermore, the determining step requires that a particular word and not a single character be the focus of the analysis.

II. Whether the combination of Chinese-English Dictionary and lookup fails to disclose “copying a Simplified Chinese character into an input field of a graphical user interface” (Appeal Brief, page 16)

In regard to the limitation “copying a Simplified Chinese character into an input field of a graphical user interface,” the Examiner states that “[i]t is the ‘Search’ field in Chinese-English Dictionary (not the “Search” menu item in lookup) that is used as the GUI (graphical user interface) field for inputting Chinese characters.” The Examiner goes on to state that “lookup (CEL Web Page) teaches copying a Chinese character which is pasted in the CEL (Chinese/English lookup) window” and that “[t]he Chinese characters copied from the Notepad file are pasted into the CEL window (a GUI) in a specific location (input field).” Finally, the Examiner states “[t]he combination of Chinese-English Dictionary and lookup (CEl Web Page) teaches inputting Chinese characters in Chinese-English Dictionary’s input field using the old and well known method of copying strings into a GUI input field.”

CEL Web Page lookup is set forth below:



The Examiner argues that CEL Web Page discloses copying and pasting a Chinese character into an input field, and that Chinese-English Dictionary discloses translating the character. Technically, the Examiner is not correct, because CEL discloses copying “words”. The example from CEL, set forth above, shows that two characters have been highlighted--not a single character. The “word” expressed by the two characters has been cut and pasted into the notepad and a translation into pin yin and an English meaning has been displayed. Therefore, as explained in the discussion above for the double patenting rejection, there is a difference between words and a single character and the analysis required is different. Appellant’s claimed invention is directed to single characters.

Furthermore, Chinese-English Dictionary discloses an input field – the “Search” field. The Examiner has not shown that the combination would provide a meaning for a single character rather than a word composed of multiple characters. In addition, even if the CEL cut and paste could be incorporated into the Chinese-English Dictionary, the additional claim elements could not be met because additional steps are necessary in order to select the type of characters (see “Simp. Chinese (GB) in second window in first row of windows below).

Chinese-English Dictionary

Search as .
Output as . Look for .

Moreover, additional selections must be made by the user for “output” and “look up for.” These steps have been eliminated by the claimed invention, and the elimination of these steps is not obvious because doing so requires setting up an entirely different graphical user interface with entirely different functionality.

III. Whether the combination of Chinese-English Dictionary and lookup (CELWeb Page) fails to disclose "simultaneously displaying the Simplified Chinese character as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word" (Appeal Brief, page 17)

The Examiner states:

Specifically Appellants argue that CEL displays the original Traditional Chinese character, one form of Pin Yin, and an English translation but fails to disclose displaying a second form of Pin Yin and a Simplified Chinese translation. However, it is Chinese-English Dictionary which is relied upon to teach the different translations (translating any input from the list including Traditional Chinese, Simplified Chinese, Pin Yin, and English into any other language/representation in the list). Further, Chinese-English Dictionary discloses inputting unaccented Pin Yin ("dian shi ji", page 1, lines 22-28, section entitled "When Searching by pinyin") and hybrid Pin Yin ("dian4 shi4 ji1 ", page 1, lines 22-28, section entitled "When Searching by pinyin") and it would have been obvious to one with ordinary skill in the art to have displayed Chinese-English Dictionary's Pin Yin representations in these different Pin Yin forms. Lookup (CEL Web Page) is relied upon to teach displaying multiple translations simultaneously. It would have been obvious to one with ordinary skill in the art to have used lookup's teaching of simultaneously displaying a word and many of the word's translations to display Chinese-English Dictionary's input word along with its many translations. The combination of Chinese-English Dictionary and lookup therefore teaches "simultaneously displaying the Simplified Chinese character as a Traditional Chinese character, an unaccented Pin Yin word, a hybrid Pin Yin word, and an English word".

Appellants submit that the Examiner erred in combining the references because Appellants claim simultaneous display of four different items in response to only one input and a single activation of a submit button. Appellants' Figure 4 is set forth below:

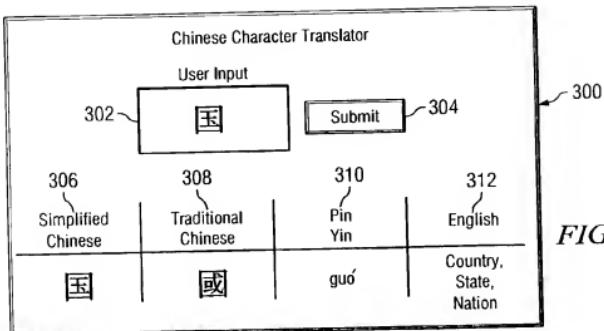
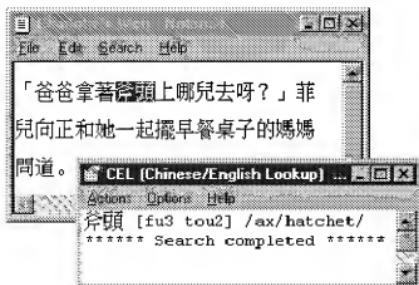


FIG. 4

Therefore, while the prior art may be able to provide the translations one or two at a time, it cannot provide all four at once in response to only a single activation after having placed the character in the input field. The prior art can provide two translations for each input in CEL Web Page. The prior art can provide one translation at a time in Chinese-English Dictionary. Together, the prior art can only provide one translation at a time because the Examiner has incorporated CEL's cut and paste into Chinese-English Dictionary. Moreover, the Examiner has not explained how the combination can provide all three translations at one time. Lookup CEL web page, while providing more than one translation at a time, does not provide four translations and cannot perform the limitation of Appellants' claim.



Moreover, CEL discloses cutting and pasting words consisting of multiple characters as explained above. CEL displays the characters that have been highlighted and two translations, but not the character and three translations as set forth in the claim. This addition is more than a simple addition--the value is that it eliminates steps and saves the user time. The user does not have to make selections and go back and forth in order to get all four items displayed side by side. Nothing in the cited art teaches or suggests providing such a display with only one button to activate. Therefore, whether CEL Web Page is incorporated into Chinese English Dictionary or vice versa, the cited art cannot provide the functionality and the manner of providing the functionality recited in the claims.

IV. Whether the combination of Chinese-English Dictionary and lookup (CEL Web Page) fails to disclose "responsive to a user activation of a single control ... displaying" because lookup (CEI Web Page) is silent to responding to activating a single control to pop up its display (Appeal Brief, page 18).

The Examiner states:

The Examiner respectfully disagrees. lookup (CEL Web Page) discloses triggering the dictionary displaying the translations not only automatically (as Appellants argue) but also manually (Page 1, Section entitled "What's new in Version 2.0?") which reads on Appellants' "responsive to a user activation of a single control ... displaying".

Appellants submit that the Examiner erred because the cited portion of CEL does not disclose what the Examiner cites if for. CEL Web Page states the following:

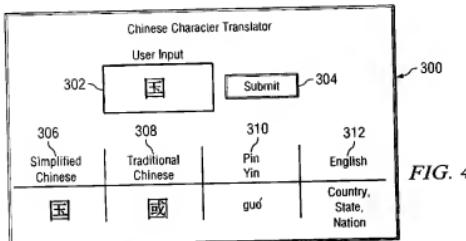
What's new in Version 2.0 ?

Version 2.0 was released on January 23rd, 1999. Now you can...

- Select dictionary entries and save them to a file for later study or reference
- Choose the Romanisation to be used in displaying dictionary entries (*Pinyin* or *Gwoyeu Romatzyh* ("GR"))
- Choose how the dictionary lookup is triggered (automatically or manually)
- Choose the style of window ("always-on-top" or standard)
- Select the display font

And settings such as the size and position of CEL's window are now recorded for the next time you use CEL.

The reference states that lookup can be triggered automatically or manually. The reference does not state how these functions are provided automatically or manually. The reference is silent beyond those words set forth above. Since no technical details are provided, the disclosure is of the idea only and not of an implementation as described in Appellants' claims. Moreover, the combined references cannot provide the full functionality claimed by Appellants. Appellants' Figure 4 shows the four items displayed as claimed in the claims on appeal:



CEL Web Pages display of the dictionary provides only three items--a word, an equivalent word, and an English translation. Furthermore, the combination does not provide for a single display in which the user input, the activation control, and the four items are displayed in one area.

CONCLUSION

For the reasons set forth above, and in Appellants' main brief, the rejection of the appealed claims should be reversed.

Date: December 3, 2009

Respectfully submitted,
/Rudolf O. Siegesmund/

Rudolf O. Siegesmund
Reg. No. 37,720
Yee & Associates, P.C.
P.O. Box 802333
Dallas, TX 75380
(972) 385-8777
Attorney for Appellants